

**From:** [kira.dabby@lw.com](mailto:kira.dabby@lw.com)  
**To:** [Eric.Albert@usdoj.gov](mailto:Eric.Albert@usdoj.gov)  
**Cc:** [KIRK.WILKINSON@lw.com](mailto:KIRK.WILKINSON@lw.com); Cora, Lori  
**Subject:** RE: DIL Trust  
**Date:** Monday, January 05, 2015 10:20:29 AM

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Eric,

Happy New Year! I hope you had a wonderful holiday season. Do you know when we can expect to receive a revised draft of the DIL Trust Consent Decree? As you know, we are looking to resolve these issues early this year.

Thank you,  
Kira

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**From:** Albert, Eric (ENRD) [mailto:[Eric.Albert@usdoj.gov](mailto:Eric.Albert@usdoj.gov)]  
**Sent:** Thursday, December 18, 2014 10:34 AM  
**To:** Dabby, Kira (NY)  
**Cc:** Wilkinson, Kirk (LA); Cora, Lori  
**Subject:** RE: DIL Trust

Kira, I'm (at long last) working on revising the DIL Trust CD. Do you think the provisions regarding the PCI Group Repository documents need to be in the CD, and if so, where?

Hopefully we will have a revision to you soon. One thing we are thinking about is the extent to which we should incorporate reactions to public comments received on the LPA CD into this one to avoid getting those comments on the DIL Trust CD after lodging.

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**From:** [kira.dabby@lw.com](mailto:kira.dabby@lw.com) [mailto:[kira.dabby@lw.com](mailto:kira.dabby@lw.com)]  
**Sent:** Monday, December 15, 2014 2:45 PM  
**To:** Albert, Eric (ENRD)  
**Cc:** [KIRK.WILKINSON@lw.com](mailto:KIRK.WILKINSON@lw.com)  
**Subject:** DIL Trust

Eric,

Per your request, I am writing to memorialize our conversation on Friday. DIL Trust consents to the use of "successor" to describe DIL Trust vis-à-vis the predecessor entities. Regarding documents from the PCI Group Repository, DIL Trust will supply to EPA documents (a) that DIL Trust previously identified in the PCI Repository (b) relating to DIL Trust or its predecessors (c) not drafted by PCI Group members or their consultants in connection with the allocation. We will run these documents by counsel for the PCI Group to make sure they do not raise any issues regarding the production based upon confidentiality, and we will advise you if they do.

Thanks,  
Kira

**Kira S. Dabby**

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